

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Larry W. Farmer, Jr.)	Case Number: 18-10471
Christine S. Farmer)	Chapter 13 Proceedings
Debtors)	Judge Arthur I. Harris

TRUSTEE’S OBJECTION TO MOTION TO MODIFY UNCONFIRMED PLAN

Now comes LAUREN A. HELBLING, the duly appointed, qualified, and standing Chapter 13 Trustee (the “Trustee”) herein, by and through counsel, and hereby files this objection to the motion to modify the unconfirmed plan of the Debtors filed on or about April 13, 2018. In support of her objection the Trustee makes the following representations to the Court:

1. The Trustee objects to the Debtors’ motion for the following reasons:
 - a. The wage order on the Debtor, Larry Farmer’s employer, Browning Ferris Industries of Ohio, is not being honored (the Debtors are current in plan payments).
2. The Trustee reserves the right to amend and/or supplement her objection, should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain her objection and deny the motion of the Debtors for the reasons cited.

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

Attorney for Lauren A. Helbling,

Chapter 13 Trustee

200 Public Square, Suite 3860

Cleveland, OH 44114-2321

(216) 621-4268

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2018, a true and correct copy of Trustee's Objection Unconfirmed Modified Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William J. Balena, on behalf of Larry and Christine Farmer, Debtors, at docket@ohbksource.com

And by regular U.S. mail, postage prepaid, on:

Larry and Christine Farmer, Debtors, at 213 Erie Street, Elyria, OH 44035

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)

LAH/pl
5/2/18